

**Remarks/Arguments:**

Claims 1-23 are presently pending and all pending claims stand rejected. Applicants herein amend claims 1, 16, and 19 to indicate that tasks are executed to completion on the request processor. In addition, claim 1 is amended to indicate that the request processor checks a memory prior to breaking down annotation requests. Support for the claim amendments is found throughout the application as originally filed. For example, see page 10, lines 5-15 and page 15, lines 1-13. Applicants contend that no new matter is added. Reconsideration is respectfully requested in view of the above amendments and the following remarks.

Section 3 of the Office Action recites "Claims 1-6, 16-19, and 22-23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Heimsoth et al. (USPN 5,764,915) (hereinafter Heimsoth) in view of Broder et al. (USPN 5,991,808) (hereinafter Broder)." Claim 1 is directed to a computer system for optimizing processing of an annotation request. Claim 1, as amended, includes the following features:

a request processor configured to receive said annotation request from said client, to query a memory to find relevant information corresponding to said annotation request, and to break said annotation request down into a plurality of constituent tasks if said relevant information is not found;

task execution means for concurrently executing the plurality of constituent tasks in the respective plurality of threads to completion on the request processor.

In response to applicants' arguments filed on May 24, 2007, in which applicants argued that Heimsoth does not disclose task execution means for executing the plurality of constituent tasks in the respective plurality of threads because the threads in Heimsoth are not used for task execution but for session management, the Office Action recites that "this limitation which applicant argues claim nothing more than that tasks are to be executed in the respective assigned plurality of threads" and that "Heimsoth clearly discloses such features in col. 24 lines 37-63." Applicants respectfully disagree. The claimed task execution means concurrently executes the plurality of constituent tasks in the respective plurality of threads on the request processor. Additionally, as amended, this element further includes the limitation that the task execution means executes these tasks to completion on the request processor. Accordingly, the claimed request processor not only

executes the tasks but executes these tasks to completion. The server in Heimsoth is devoid of executing tasks to completion on a request processor. Accordingly, applicants contend that Heimsoth fails to disclose, teach, or suggest the claimed task execution means. Further, applicants contend that Broder also fails to disclose, teach, or suggest this feature. As the applied references fail to disclose, teach, or suggest each and every limitation of claim 1; namely, the claimed "task execution means that concurrently executes plurality of constituent tasks in the respective plurality of threads to completion on the request processor," applicants contend that claim 1 is allowable over Heimsoth in view of Broder. Accordingly, applicants respectfully request that the rejection of claim 1 be withdrawn.

Additionally, claim 1, as amended, includes the additional feature of queuing a memory for relevant information related to an annotation request prior to breaking down the annotation request. Heimsoth and Broder are each entirely devoid of such a feature and thus fail to disclose, teach, or suggest this additional aspect of claim 1. Accordingly, applicants contend that claim 1 is allowable for this additional reason.

Claims 16 and 19, while not identical to claim 1, include the feature of executing the constituent tasks in the threads to completion on the request processor as found in claim 1. Accordingly, applicants contend that claims 16 and 19 are allowable for at least this aspect which, as discussed above, makes claim 1 allowable.

Claims 2-6 depend from claim 1; claims 17 and 18 depend from claim 16; and claims 22 and 23 depend from claim 19. Thus, these claims are not subject to rejection under 35 U.S.C. § 103(a) of Heimsoth and Broder for at least the reasons discussed above for the claims from which they depend.


Section 12 of the Office Action recites that "Claim 7 is rejected under 35 U.S.C. 103(a) as being unpatentable over Heimsoth in view of Broder in view of Bahr;" section 14 recites that "Claims 8-9 are rejected under 35 U.S.C. 103(a) as being unpatentable over Heimsoth in view of Broder in view of Bauer;" section 16 recites that "Claims 10-11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Heimsoth in view of Broder in view of van Hoff;" and Section 19 recites that "Claims 12-15 and 20-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Heimsoth in view of Broder in view of Spix et al." Applicants respectfully submit that none of the references relied upon in rejecting these

claims include the feature discussed above with respect to independent claims 1, 16, and 19. As these references fail to make up for the deficiencies of Heimsoth and Broder with respect to claims 1, 16, and 19, applicants contend that claims 7-15, 20, and 21 which depend therefrom are allowable as well.

In view of the foregoing remarks, applicants request that the Examiner reconsider and withdraw the rejection of claims 1-23.

Respectfully submitted,

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Dated: November 1, 2007